Case 1:21-cv-09576-CM-RWL UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YOR		USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 7/15/2022
HENKELS & MCCOY GROUP, INC., e		
Plaintiffs,	:	21-CV-9576 (CM) (RWL)
- against -	:	ORDER
VERIZON SOURCING LLC	:	
Defendants	: : : :	

ROBERT W. LEHRBURGER, United States Magistrate Judge.

As discussed during the telephone conference held on July 15, 2022:

- 1. Defendant shall produce documents from custodians George Karatzi, Michael Delaney, Tony Tate, and Will Rankin. The parties may meet and confer as to whether they can agree upon modified search terms that would narrow the number of documents returned from those four individuals; but if the parties do not reach an agreement, Defendant will need to produce the documents obtained from an unmodified search. So that discovery may proceed in timely fashion, the foregoing meet-and-confer should be completed no later than July 25, 2022.
- 2. By **July 29, 2022**, Defendant shall serve an amended response to Plaintiffs' interrogatory number 3 that provides an explanation of how the estimated damages figures were determined. For example, and without limitation, if a particular total is the sum of contract amounts for a group of contractors, then the answer needs to identify the contractors and the contract amount associated with each contract/contractor. In other words, Defendant shall disclose the specific components of the calculation, and the method of the calculation, that it used to arrive at its estimated

damages figures. Defendant will of course have an opportunity -- and obligation -- to amend its interrogatory answers at a later date with more definite and complete numbers.

This resolves the letter motion at Dkt. 39.

SO ORDERED.

ROBERT W. LEHRBURGER

UNITED STATES MAGISTRATE JUDGE

Dated: July 15, 2022

New York, New York

Copies transmitted this date to all counsel of record.